

## REMARKS

This is a full and timely response to the outstanding non-final Office Action mailed January 12, 2005. Upon entry of the amendments in this response, claims 1 - 19 remain pending. In particular, Applicants have added claims 14 - 19, and have amended claims 1, 4, 7 and 9 - 11. Reconsideration and allowance of the application and presently pending claims are respectfully requested.

### Rejections Under 35 U.S.C. §103

The Office Action indicates that claims 1 - 13 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Ratnaraj* in view of *Lipner*. Applicants respectfully traverse the rejection.

In this regard, *Ratnaraj* generally relates to authenticated access to Internet based research and data services and *Lipner* generally relates to secure user authentication from a personal computer. However, neither appears to be related to the features recited in Applicants' amended claims.

In particular, claim 1 has been amended to recite:

1. ***A method for configuring a target device to operate as peripheral hardware for a host device***, comprising the steps of:
  - receiving a log-in request to connect the target device to the host device, wherein the log-in request includes a host designator identifying a type of host device;
  - accessing a table of host designators and associated O/S protocol types;
  - determining if there is a match of the log-in request host designator to a host designator in the table; and
  - selecting an O/S protocol associated with the match to the host designator such that the O/S protocol selected is used by the target device, in operating as peripheral hardware for the host device, to interpret commands received from the host device.***(Emphasis Added).

Applicants respectfully assert that the cited art, either individually or in combination, is legally deficient for the purpose of rendering claim 1 unpatentable. In particular, Applicants respectfully asserts that none of the references or combinations thereof teaches or reasonably suggest at least the features/limitations emphasized above in claim 1. Therefore, Applicants respectfully assert that claim 1 is in condition for allowance.

Since claims 2 – 6 and 14 - 16 are dependent claims that incorporate all the features/limitations of claim 1, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features/limitations that can serve as an independent basis for patentability. By way of example, claim 3 recites:

3. The method as defined in claim 1, further comprising the step of determining if a mode parameter is set for a default O/S protocol; and ***selecting that default O/S protocol unless there is a match of the log-in request host designator in the table.***  
(Emphasis Added).

Applicants respectfully assert that the cited art is legally deficient for the purpose of rendering claim 3 unpatentable, because none of the references or combinations thereof teaches or reasonably suggests at least the features/limitations emphasized above in claim 3.

In this regard, the Office Action indicates that *Lipner* discloses the aforementioned features of claim 3 at col. 5, lines 45 – 63. That portion of *Lipner*, however, discloses the following:

In one embodiment of the present invention, after updating the time of last login, the login software examines the portion of the hard disk or other storage device to be booted as the operating system of the personal computer after authentication is completed. The login software calculates a message digest (i.e., a one-way hash) of the operating system software to be booted, stored in a predetermined location on the hard disk, and compares it with the lists of acceptable digests stored on the user's floppy disk. If the value matches one of those on the floppy disk, the name associated with that digest on the floppy disk is displayed on the screen and the user is asked whether he wants to run with this system. Alternate embodiments are envisioned wherein the user is also asked, if he desires to run with the displayed operating system, in what role he wants to run the operating system. The use of roles in system security is discussed in detail in the above referenced co-pending applications which

are hereby incorporated by reference. ***In this embodiment, the user--in addition to noting whether he wants to run with the displayed operating system--responds with a role name (or a default may be selected that is read from the floppy).*** (*Lipner* at col. 5, lines 41 – 63). (Emphasis Added).

Thus, the cited portion of *Lipner* relates to the use of a default role name, not a default O/S protocol as recited in claim 3. Therefore, Applicants respectfully assert that claim 3 clearly is in condition for allowance.

By way of further example, claim 4 recites:

4. The method as defined in claim 1, further comprising the step of receiving a command from the host device; and ***determining if the command is an O/S dependent command***; and wherein the step of ***accessing the table is only performed if the received command is an O/S dependent command.*** (Emphasis Added).

Applicants respectfully assert that the cited art is legally deficient for the purpose of rendering claim 4 unpatentable, because none of the references or combinations thereof teaches or reasonably suggests at least the features/limitations emphasized above in claim 4.

In this regard, the Office Action indicates that *Lipner* discloses the aforementioned features of claim 4 at col. 5, lines 45 – 63 (set forth above), and col. 1, lines 60 - 67. That portion of *Lipner*, however, discloses the following:

One method for authenticating a user is through the use of a secret password. ***Under this method, each system user is given a secret password and it is assumed that only that user has access to the password.*** A list is then maintained in memory in the personal computer or computing system's memory that matches each user with his password. To authenticate a user under this method, a process running on the personal computer or in the computer system generally prompts the user to type in his user name and password. ***If the entered password matches the stored password for that user, the process concludes that the user is who he says he is and allows the user to login to the personal computer or the computing system. In other words, the entry of a correct password "authenticates" the user.*** (*Lipner* at col. 1, line 58 to col. 2, line 4). (Emphasis Added).

Thus, the cited portion of Lipner relates to the use of a user dependent password, not a a O/S dependent command as recited in claim 4. Therefore, Applicants respectfully assert that claim 4 clearly is in condition for allowance.

With respect to claim 7, that claim has been amended to recite:

7. A system for configuring itself for a particular O/S protocol, comprising:  
a table of system host system designators and associated O/S protocol types;  
a component for receiving a log-in request to connect the system to a host, wherein the log-in request includes a host designator;  
a component for accessing the table of host designators and associated O/S protocol types;  
a component for determining if there is a match of the log-in request host designator to a host designator in the table; and  
***a component for selecting an O/S protocol associated with the match to the host designator such that the O/S protocol selected is used by the system to interpret commands received from the host.***  
(Emphasis Added).

Applicants respectfully assert that the cited art, either individually or in combination, is legally deficient for the purpose of rendering claim 7 unpatentable. In particular, Applicants respectfully assert that none of the references or combinations thereof teaches or reasonably suggests at least the features/limitations emphasized above in claim 7. Therefore, Applicants respectfully assert that claim 7 is in condition for allowance.

Since claims 8 - 10 and 17 - 19 are dependent claims that incorporate all the features/limitations of claim 7, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features/limitations that can serve as an independent basis for patentability.

With respect to claim 11, that claim has been amended to recite:

11. A program product for configuring a target device, comprising machine-readable program code for causing a machine to perform the following method steps:

receiving a log-in request to connect the target device to a host, wherein the log-in request includes a host designator;  
accessing a table of host designators and associated O/S types;  
determining if there is a match of the log-in request host designator to a host designator in the table; and

***selecting an O/S protocol associated with the match to the host designator such that the O/S protocol selected is used by the target device to interpret commands received from the host.***

(Emphasis Added).

Applicants respectfully assert that the cited art, either individually or in combination, is legally deficient for the purpose of rendering claim 11 unpatentable. In particular, Applicants respectfully assert that none of the references or combinations thereof teaches or reasonably suggests at least the features/limitations emphasized above in claim 11. Therefore, Applicants respectfully assert that claim 11 is in condition for allowance.

Since claims 12 and 13 are dependent claims that incorporate all the features/limitations of claim 11, Applicants respectfully assert that these claims also are in condition for allowance. Additionally, these claims recite other features/limitations that can serve as an independent basis for patentability.

### **Newly Added Claims**

Upon entry of the amendments in this response, Applicants have added new claims 14 – 19. Applicants respectfully assert that these claims are in condition for allowance for at least the reason that these claims are dependent claims that incorporate the limitations of their respective independent claims, the allowability of which are described above. Additionally, these claims recite other features/limitations that can serve as an independent basis for

patentability. By way of example, claim 15 recites that "the target device communicates with the host device via a SCSI interface." Applicants respectfully assert that the cited art is legally deficient for the purpose of rendering claim 15 unpatentable, because none of the references or combinations thereof teaches or reasonably suggests at least the additional features/limitations recited in claim 15. Therefore, Applicants respectfully request that claim 15 be placed in condition for allowance.

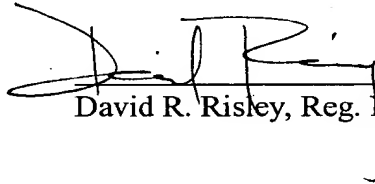
**Cited Art Made of Record**

The cited art made of record has been considered, but is not believed to affect the patentability of the presently pending claims.

### CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicants respectfully submit that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the pending claims are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,



David R. Risley, Reg. No. 39,345

**THOMAS, KAYDEN,  
HORSTEMEYER & RISLEY, L.L.P.**  
Suite 1750  
100 Galleria Parkway N.W.  
Atlanta, Georgia 30339  
(770) 933-9500

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail, postage prepaid, in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on 4/15/05.

Stephanie Riley  
Signature